

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 7:19cr00095</b>
	:	
<b>ROGER ALLAN BELLINI</b>	:	

**ADDENDUM TO THE GOVERNMENT’S SENTENCING MEMORANDUM**

COMES NOW the United States of America by counsel and hereby submits this addendum to its sentencing memorandum filed on February 25, 2021. The attachment to this addendum contains a request for restitution by “April” received by the Government on March 2, 2021. April is the victim from the “aprilblonde” series of child pornography images and a victim of Count Six of the indictment. To date, April has not received restitution for the full amount of her losses. The request contains a victim impact statement from April, a psychological evaluation from January 2021 detailing approximately \$226,375 in anticipated treatment costs, and an affidavit from her attorney detailing at least \$4,575 in legal expenses. The attachment also contains an email from Mr. Bellini’s counsel offering \$3,000 in restitution and an email from the victim’s counsel on March 3, 2021 agreeing to accept \$3,000 in restitution. The Government requests that the attachment to this addendum be placed under seal.

Respectfully submitted,

DANIEL P. BUBAR  
Acting United States Attorney

Date: March 3, 2021

/s/ Rachel Barish Swartz  
Rachel Barish Swartz  
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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send a copy of said filing to counsel for the defendant.

/s/ Rachel Barish Swartz  
Assistant United States Attorney